1 2 3 4 5 6	KARA J. JANSSEN – 274762 ADRIENNE SPIEGEL – 330482 LUMA KHABBAZ – 351492 ROSEN BIEN GALVAN & GRUNFELD LLP 101 Mission Street, Sixth Floor San Francisco, California 94105-1738 Telephone: (415) 433-6830 Email: egalvan@rbgg.com kjanssen@rbgg.com	REN NIMNI* Mass. Bar No. 691821 MARIS MONTES* Md. Bar No. 2112150205 IGHTS BEHIND BARS 6 Florida Avenue N.W. #26152 Tashington, D.C. 20001-0506 Elephone: (202) 455-4399 mail: oren@rightsbehindbars.org amaris@rightsbehindbars.org
7 8 9 10	aspiegel@rbgg.com lkhabbaz@rbgg.com SUSAN M. BEATY – 324048 CALIFORNIA COLLABORATIVE FOR IMMIGRANT JUSTICE 1999 Harrison Street, Suite 1800 Oakland, California 94612-4700 Telephone: (510) 679-3674	N.Y. Bar No. 4979357 ARNOLD & PORTER KAYE SCHOLER LLP 250 West 55th Street New York, New York 10019-9710 Telephone: (212) 836-8000 Email: stephen.cha-kim@arnoldporter.com CARSON D. ANDERSON – 317308
11 12 13 14	Email: susan@ccijustice.org	ARNOLD & PORTER KAYE SCHOLER LLP 3000 El Camino Real Five Palo Alto Square, Suite 500 Palo Alto, California 94306-3807 Telephone: (650) 319-4500 Email: carson.anderson@arnoldporter.com
15 16	Attorneys for Plaintiffs	* Admitted pro hac vice
17	UNITED STATES DISTRICT COURT	
18 19	NORTHERN DISTRICT OF CA	ALIFORNIA, OAKLAND DIVISION
<ul> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ul>	CALIFORNIA COALITION FOR WOMEN PRISONERS et al.,  Plaintiffs,  v.  UNITED STATES OF AMERICA FEDERAL BUREAU OF PRISONS et al.,  Defendants.	Case No. 4:23-cv-04155-YGR  PLAINTIFFS' RESPONSE TO ORDER NO. 1 RE SELECTION OF SPECIAL MASTER  Judge: Hon. Yvonne Gonzalez Rogers  Trial Date: None Set
28		

Plaintiffs respond to the Court's Order No. 1 Re Selection of Special Master (Dkt. 1 No. 232) (the "Order") as follows: 2 3 In response to paragraph 1 of the Order, Plaintiffs strike the following three candidates from the United States' List of Proposed Special Masters (Dkt. No. 228): John 4 5 Baldwin; Helen Marberry; and Stephen Spaulding. In response to paragraph 6 of the Order, Plaintiffs identify the undersigned, Kara 6 Janssen, as the attorney to attend the interviews discussed in paragraph 5 of the Order. 7 8 Finally, Plaintiffs note that they have never been provided with a copy of the March 9 2022 Dublin Task Force Report. In order to comply with paragraph 2 of the Order the 10 government must immediately furnish Plaintiffs with that report so that they can provide it to their special master candidates with ample time for review. Dkt. 135 (United States' 11 Notice of In Camera Exhibits Exchanged, omitting the Task Force Report); Dkt. 142 12 13 (Plaintiffs Post-Evidentiary Brief discussing that the United States refused to produce a 14 copy of the Task Force Report to Plaintiffs). 15 **DATED:** March 27, 2024 16 Respectfully submitted, 17 ROSEN BIEN GALVAN & GRUNFELD LLP 18 19 By: /s/ Kara Janssen Kara J. Janssen 20 21 Attorneys for Plaintiffs 22 23 24 25 26 27 28

4461434.1] 2 Case No. 4:23-cv-04155-YGR